

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE
COMPANY, *et al.*,

Plaintiffs,

v.

ABBOTT LABORATORIES,

Defendant.

Civil Action No. 05-11150-DPW

**MOTION OF NONPARTY STONETURN GROUP, LLP
TO QUASH OR MODIFY SUBPOENA**

Pursuant to Fed. R. Civ. P. 45(c), the nonparty StoneTurn Group, LLP (“StoneTurn”) hereby moves for an order quashing of modifying a subpoena for documents and a deposition issued by the defendant Abbott Laboratories (“Abbott”) on March 23, 2007 (the “Subpoena”).

As grounds for this motion, StoneTurn states that (a) the Subpoena improperly seeks to require a partner of StoneTurn to be deposed twice in this action, (b) the Subpoena is the second subpoena seeking documents from StoneTurn in this case, (c) StoneTurn already produced documents in response to the first subpoena, (d) the request for documents in the Subpoena is duplicative, overbroad and unduly burdensome, and (e) the Subpoena seeks the production of highly confidential documents that belong to other third parties and not relevant to this action. Further grounds for this Motion are described

or supported in the Memorandum in Support of Nonparty StoneTurn Group, LLP's Motion to Quash and the Affidavit of Andrew C. Griesinger filed herewith.

REQUEST FOR ORAL ARGUMENT

StoneTurn requests oral argument on this motion.

STONETURN GROUP, LLP

By its attorneys,

/s/ Andrew C. Griesinger

Andrew C. Griesinger (BBO No. 211285)

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Dated: April 19, 2007

CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 7.1 AND 37.1

I, Andrew C. Griesinger, hereby certify that I conferred with Eric Lorenzini, counsel for Abbott, by telephone on April 10 and 12, 2007 and in correspondence with respect to the issues raised in this motion and that counsel were unable to resolve them.

/s/ Andrew C. Griesinger

Andrew C. Griesinger

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants (if any) on April 19, 2007.

/s/ Andrew C. Griesinger
Andrew C. Griesinger